

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: BEVERLY JEAN GIBSON, Debtor

**Case No. 22-02640-JAW
CHAPTER 13**

NOTICE

Debtor has filed papers with the court to Modify their Chapter 13 Bankruptcy Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran United States Courthouse
501 E. Court St., Ste 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Modify Plan.

Date: June 30, 2025

Signature:

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer Ann Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: BEVERLY JEAN GIBSON, Debtor

**Case No. 22-02640-JAW
CHAPTER 13**

MOTION TO MODIFY BANKRUPTCY PLAN

COMES NOW, Debtor, by and through counsel, and moves this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

1. Debtor commenced this case on December 21, 2022 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The Debtor wishes to modify the confirmed Chapter 13 plan by extending the duration from 36 months to 60 months with the monthly plan payment reduced from \$256.00 to \$75.00.
3. The Debtor's income has decreased as they are no longer able to work and are now relying solely on Social Security benefits.
4. Debtor has filed a supplement to schedules I/J (Dk#54), evidencing current income and expenses.
5. The reduced plan payment is intended to allow the debtor to make consistent payments over an extended term and successfully complete the plan while maintaining a 0% distribution to unsecured creditors.
6. Except as expressly modified herein, all other provisions of the original confirmed Chapter 13 plan should remain in full force and effect.

WHEREFORE, Debtor prays that their Bankruptcy Plan be modified to reflect the above-mentioned changes and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

Thomas C. Rollins, Jr.
Jennifer Ann Curry Calvillo
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on July 1, 2025, to:

By Electronic CM/ECF Notice:

Harold J. Barkley, Jr.

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
BEVERLY JEAN GIBSON

CASE NO: 22-02640

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/1/2025, I did cause a copy of the following documents, described below,
Notice and Motion to Modify Plan

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/1/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

BEVERLY JEAN GIBSON

CASE NO: 22-02640

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 7/1/2025, a copy of the following documents, described below,

Notice and Motion to Modify Plan

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/1/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 22-02640
SOUTHERN DISTRICT OF MISSISSIPPI
MON JUN 30 14-34-56 PST 2025

ALLY FINANCIAL CO AIS PORTFOLIO
SERVICES
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

FIRST METROPOLITAN FINANCIAL SERVICES
CLIN
CO B JOEY HOOD II ATTORNEY AT LAW PLLC
PO BOX 759
ACKERMAN MS 39735-0759

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

1ST FRANKLIN FINANCIAL
398 HIGHWAY 51
RIDGELAND MS 39157-3401

1ST FRANKLIN FINANCIAL CORPORATION
PO BOX 880
TOCCOA GA 30577-0880

1ST HERITAGE CREDIT
3047 HWY 80 E
PEARL MS 39208-3434

AACE CHECK ADVANCE
6800 OLD CANTON RD STE 101
RIDGELAND MS 39157-1254

ADVANCED RECOVERY
219 KATHERINE DRIVE
FLOWOOD MS 39232-9588

B JOEY HOOD II ESQ
FOR FIRST METROPOLITAN FINANCIAL
SERVICE
CLINTON BRANCH
POST OFFICE BOX 759
ACKERMAN MS 39735-0759

CAMPBELL CREDIT COMPANY
3202 SERVICE DRIVE
PEARL MS 39208-3527

CHECK INTO CASH
704 US 80
CLINTON MS 39056-5128

COMMUNITY LOANS
410 CHRISTINE DR
STE D
RIDGELAND MS 39157-3421

(P) FAMILY CHOICE FINANCIAL
3208 SERVICE DRIVE
SUITE E
PEARL MS 39208-3539

FIRST METROPOLITAN FINANCIAL SERVICES
CLINTON BRANCH
305 HWY 80 EAST
CLINTON MS 39056-4717

FIRST PREMIER
3820 N LOUISE AVE
SIOUX FALLS SD 57107-0145

FIRST PREMIER BANK
3820 N LOUISE AVE
SIOUX FALLS SD 57107-0145

FORTIVA
PO BOX 105555
ATLANTA GA 30348-5555

~~EXCLUDE~~

(P) HARBOR LOANS OF CLINTON INC
322 HIGHWAY 80 EAST SUITE 8
CLINTON MS 39056-4726

~~(D) (P) HARBOR LOANS OF CLINTON INC
322 HIGHWAY 80 EAST SUITE 8
CLINTON MS 39056-4726~~

HEIGHTS FINANCE HOLDINGS CO
DBA FIRST HERITAGE OF MISSISSIPPI LLC
2
PO BOX 1947
GREENVILLE SC 29602-1947

JACKSON THYROID
971 LAKE LAND DR
353
JACKSON MS 39216-4607

LIBERTY
2425 US HWY 80
CLINTON MS 39056

MEA
935 HWY 51
MADISON MS 39110-8407

ORAL MAXILLOFACIAL S
971 LAKE LAND DR
STE 225
JACKSON MS 39216-4615

(P) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

PREMIER BANKCARD LLC
JEFFERSON CAPITAL SYSTEMS LLC ASSIGNEE
PO BOX 7999
SAINT CLOUD MN 56302-7999

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

REGIONS BANK
359 W WOODROW WILSON
JACKSON MS 39213-7596

SMITH ROUCHON
1456 ELLIS AVE
JACKSON MS 39204-2204

SOCIAL SECURITY ADMINI
61 FORSYTH ST SW
STE 20T45
ATLANTA GA 30303-8910

SOCIAL SECURITY ADMINI
CO US ATTORNEY
501 E COURT ST
STE 4430
JACKSON MS 39201-5025

ST DOMINIC
PO BOX 101928
DEPT 2174
BIRMINGHAM AL 35210-6928

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENW
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430
JACKSON MS 39201 5022~~

DEBTOR

BEVERLY JEAN GIBSON
1422 PILLARS ST
JACKSON MS 39213-6734

~~EXCLUDE~~

~~HAROLD J BARKLEY JR
PO BOX 4476
JACKSON MS 39296 4476~~

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236 3767~~